

March 25, 2024

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**VIA ECF**

Hon. Laura Swain, U.S.D.J.  
Daniel Patrick Moynihan  
United States District Courthouse  
Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

Re: *Annamarie Trombetta v. Norb Novocin, et.al.*  
Civil Action No. 18-cv-993  
Our File No. 19701.00006

Dear Judge Swain:

As your Honor is aware, we represent Defendant WorthPoint Corporation (“WorthPoint”). Please allow this correspondence to address Plaintiff’s “Right to File a Motion to Alter or Amend Pursuant to F.R.C.P Rule 59 (e) and Pursuant To F.R.C.P Rule 60 Relief From a Judgment Based Upon Errors”, which was filed as ECF 542 on March 19, 2024. With this Motion, Plaintiff has included documents that were produced during discovery by WorthPoint and were marked “CONFIDENTIAL”. These documents now appear in Plaintiff’s public filing as Exhibit 1: WorthPoint’s redacted sublicensing agreement, marked “CONFIDENTIAL”, and Exhibit 2: WorthPoint’s webpage metadata text of Plaintiff’s biography, marked “CONFIDENTIAL”.

Despite the Court’s previous warnings and instruction that Plaintiff must upload Confidential documents to the Court’s public electronic file under seal, Plaintiff has again filed WorthPoint’s confidential records as part of the public record. This is yet another example of Plaintiff’s repeated and blatant disregard for the Court-issued protective order and confidentiality designations. Magistrate Judge Cave has already retroactively sealed Plaintiff’s public filings once before in order to protect WorthPoint’s information. See ECF 224-227.

Accordingly, we again respectfully request that the Court seal the Motion papers, together with any further relief as the Court deems just and proper.

Respectfully submitted,

**WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP**

/s/ Jana S. Farmer  
Jana S. Farmer

cc: All counsel  
Annamarie Trombetta